

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VALLAIR SOLUTIONS, SARL,

*Plaintiff and Counterclaim  
Defendant,*

v.

321 PRECISION CONVERSIONS, LLC,

*Defendant and Counterclaim  
Plaintiff.*

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 9/24/2024

NO. 1:21-cv-07507-CM-RWL

JUDGE COLLEEN MCMAHON

DEFENDANT 321 PRECISION  
CONVERSIONS, LLC AND PLAINTIFF  
VALLAIR SOLUTIONS SARL'S JOINT  
MOTION TO SEAL OR REDACT

Defendant 321 Precision Conversions, LLC (“Precision”), with the consent and agreement of Plaintiff Vallair Solution SARL (“Vallair”), respectfully moves this Court for leave to file certain documents under seal or in redacted form, to protect Confidential Information as contemplated in the parties’ Confidentiality Agreement and Stipulated Protective Order (Doc. 37), including documents previously designated by a party as “Confidential” or “Confidential Attorneys’ Eyes Only.” A memorandum of law is jointly submitted by both parties in support of this motion.

Dated: April 29, 2024

Respectfully submitted,

*/s/ Chelsea Mikula*

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*9/24/2024  
This motion is granted  
temporarily, and no longer  
valid as of April 30, 2024, so  
that the parties may file  
certain redacted documents (NOT  
sealed, but redacted) pending a  
hearing with no redactions used.  
Hard copies with no redactions used  
will be delivered to chambers immediately when a decision is  
reached on the underlying motion. The parties will have 10 days  
& explain why anything in that decision should remain confidential.  
CM*

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Consented and agreed to on this 29<sup>th</sup> day of April, 2024, by:

*By: /s/ Evan Kwarta with express permission*

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**PROOF OF SERVICE**

A copy of the foregoing was served on April 29, 2024 by sending it by electronic means to the email addresses provided by the parties as follows:

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*Attorneys for Plaintiff Vallair Solutions SARL*

Dated: April 29, 2024

Respectfully submitted,

*/s/ Chelsea Mikula*  
\_\_\_\_\_  
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*One of the Attorneys for Defendant 321 Precision  
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